



New Tools for Fighting Corruption in Organizations

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Introduction

The word “corruption” conjures up images of back room deals between selfish government officials and opportunistic businesspeople, both looking to enrich themselves at the expense of the people. Certainly, such high-level crimes create poverty, death and outrage.

There are also the lesser government officials who abuse their power in the day-to-day operations of government. But corruption goes beyond even this.

Most corruption is virtually invisible but, like the “death of a thousand cuts,” can leave an organization crippled and dying. Insidious forms of corruption can remain hidden if not properly defined, identified and corrected.

The full definition of “corruption” extends beyond bribery and embezzlement to encompass the idea of decay. The word itself comes from concepts of rot; breakage; making something less than what it was intended to be.

Using a definition that expands beyond the more recent and specialized idea of “abuse of power” opens the door to many solutions for both identifying and fighting the problem.

Some of the ideas that flow from corruption as decay can be addressed through effective management policies. These policies, when properly implemented, will do much to prevent organizational decay – not to mention actual criminal activity.

For example, many government organizations are unclear about what they are supposed to produce. Indeed, many will resist the idea that the government is supposed to provide anything of measurable value in exchange for the tax dollars they spend. Any organization that fails to

understand what it produces, and fails to align its policies toward its products, will decay. It becomes corrupted.

If that organization is part of a government, the government itself begins to decay and lose relevance.

There are logical approaches that can be taken to root out and prevent corruption in *any organization* - including government institutions.

This white paper was written to provide a straight-forward diagnostic tool that will reveal corruption problems in any organization. And, by using the New Tools for Fighting Corruption in Organizations, solutions to identify and correct corruption problems will become clear.

Spirals of decay can be reversed and prevented. Organizational integrity can be maintained. Best of all, the organization can be set on – and can stay on – a path toward reaching its purposes and goals. Anticorruption is not just about fighting bribery and embezzlement. Indeed, the only meaningful goal of anticorruption is to prevent the decay of society while we work together to build a future.

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The Game of “Survive and Prosper”

If there was a game being played in which each player sets his own rules, there would be no game. There would only be argument, confusion, and conflict. The game would end or become a confusion of activity among the players.

The purpose of governments and other organizations is to strengthen the ability of groups to play the game of “survive and prosper.” Whether they are formed for defense, administrative or other purposes, those purposes lead to the survival and potential prosperity of the group. The standard for “winning” is a group that creates the highest level of long-term prosperity for its people.

A look at governments around the world today reveals this to be true. What commonly are perceived to be the “best” of the governments are those governments that have created the highest level of prosperity for their people. Governments such as the United States, United Kingdom, Norway, and others have high standards of living for the majority of their populations. The governments of these countries have arguably done well thus far at the game of “survive and prosper.”

Those governments that have been viewed as weak or ineffective are organized for the benefit of smaller groups of people while their overall populations suffer or are neglected. They are failing at the game of “survive and prosper.”

Survival requires that the players of the game operate by a common set of rules. Failure to abide by the rules will end the game. Similarly, where there are no shared rules, the game will also end in confusion.

Corruption in an organization is the situation where people within the organization stop playing by the agreed upon rules of the game. They break the agreement by which they

received their jobs and stop performing the tasks expected of them. They stop following the rules.

Instead, they do something that is primarily for themselves and at the expense of others in society. They play a much smaller game of “survive and prosper.” The game they are playing is played for themselves alone, with little regard for the rest of society that may be relying on them.

Sometimes it appears that the “clever” political operators know the “real” rules that are not known to all. The idea is that some inner circle of politically adroit people is operating by the rules that are secret from the population at large. Of course, if the rules are secret, except to a small group, then people are again playing by different rules and there is confusion. Setting aside the question of whether the rules are appropriate, lack of agreement results in failure of the game. Failure of the game results in decay, collapse and corruption.

What are the Rules of the Game?

In a government or organizational context, the rules of the game are the laws and policies.

The word “policy” as used here has a specific definition.

Definition: Policy

Policy means the principles evolved and issued by top management for a specific activity to guide planning and programming and authorize the issuance of projects by executives. Policies permit the issuance and enforcement of orders that direct personnel in achieving production.

Policy is a rule by which the conduct of the organization’s affairs can be guided.

This includes the laws of an area.

Of course, frustrations abound when policy is not followed. Invariably, this leads to the decay (i.e. corruption) of the organization.

Three Common Reasons for Not Following Policy

Three common reasons for not following policy are:

1. Criminal intent.
2. Ignorance of policy or the meaning of the policies.
3. A “no-confidence” action by employees.

Criminal Intent: One example of criminal intent in the U.S. is found in a recent conspiracy uncovered in the State of Pennsylvania. A local judge had a secret financial agreement with a juvenile rehabilitation facility whereby he would get paid for every “customer” he sentenced to the facility. The result was that many young people were unfairly found guilty and sentenced to that facility. The corrupt judge collected millions of dollars.

The State of Pennsylvania, of course, had a judicial code of conduct in place that prohibited judges from profiting from the sentences that they meted out. The judge had a criminal intent to disregard this code and the laws of the state. Many young people were illegally incarcerated and the public’s confidence in the legal system was damaged.

As this example shows, criminal intent to disregard policy causes the decay of organizations. Fortunately, the number of people with criminal intentions in any typical organization is small.

Ignorance of Policy: Ignorance of policy can occur within even within the highest levels of any organization.

Senior government officials of a sub-Saharan African Country were unaware of the government finance policies regarding travel expenditures and reimbursements. They had claimed hotel, transportation and meals, while also claiming a “per diem” above the actual expenses of the travel. This extra per diem sometimes equaled as much as USD \$800.00 per day. The finance department failed to inform the government officials of the correct travel expense and reimbursement policy, and failed to apply the policy even as it was making the overpayments.

Not only did the overpayments squander government resources, but they also gave government officials a cash incentive to travel. Consequently, development of the country was brought to a snail’s pace as senior officials were often out of the country collecting “per diem” rather than in their offices performing crucial functions.

Ignorance of policy is an insidious problem that destroys the best intentions and efforts of any organization and assures that it will decay. When found in a country that is trying to develop, ignorance of policy guarantees stalled progress.

No-Confidence Action: A “no-confidence” action by employees happens in response to policies that do not address the needs of the employees to accomplish their work.

In Iraq during Saddam Hussein’s rule, it was common for the central government to issue policies and rules that had little or no relevance to people in the provinces outside of Baghdad. The provinces quickly learned to report as if they were implementing Saddam’s policies. In actuality they ignored these policies and implemented their own policies. Whatever programs Saddam’s staff was trying to implement were doomed to failure from the start

because the provincial governments had no confidence in the relevance of the programs.

Ironically, international development organizations have met with some of the same fate when attempting to deliver training programs. Employees will sometimes find the programs unsuited to the needs of the government and culture. In one instance, employees decided unilaterally to change the programs without informing their senior management. They developed their own training to match the needs of their government clients. Thus, the development company's programs were not being delivered because its employees had no confidence that the programs were relevant. None of this was visible to the corporate management.

While the employees' motives may have been good (trying to deliver what was needed), this type of deviation from policy harms the organization. The organization can't make needed corrections, either to its programs or to the unauthorized programs, to ensure that all organizational goals are met.

Each of the three reasons for failing to follow policy could be subdivided to a much greater degree, but these broad categories suffice for problem solving.

Whenever people begin to break the organizational policies for any reason, they are creating new, unauthorized policies.

These unauthorized policies cause the corruption of the organization. The organization breaks down from a large, common purpose organization to a series of smaller organizations with separate interests.

It ceases to be an organization.

Unauthorized policy set at unauthorized levels spoils the planned actions of a group and is responsible for inactivity, non-production, lack of group morale and failure of the group.

Unauthorized policies are destructive and run counter to the authorized policies. They are counter-policies.

At the start it should be clear that someone or some body should be authorized to set policy for the group. Absence of this function is an invitation to random policy, group conflict and disintegration. If such a person or body exists, new proposed policy must be referred to this person or body and issued, not set randomly by unauthorized persons.

Policies set by the policy authority must be informed enough and wise enough to forward the group purpose and to obtain agreement. They must be relevant to the efforts of the group to survive and prosper.

Government poses a special problem because of its vital role to so many. Governments organized and conducted solely for self-interested individuals and groups tend to have a short life span. These governments imperil the survival of everyone, including those who attempt to use the government for such self-interest. Such governments inevitably begin the descent into death from corruption. The same is true of corporations.

More is said about this subject in case studies 6.1, 6.2 and 6.3 below.

New Tools for Fighting Corruption in Organizations

The list below can be used to diagnose common corruption problems. There are several easy to understand points that allow policy to be used to strengthen organizations. When these points are not followed, organizations fail to meet their purpose and decay. Although this paper is principally focussed on government, the rules below apply to any organization or group.

These points comprise the New Tools for Fighting Corruption in Organizations. Each point of the checklist is described below, followed by one or more brief case studies.

1. Someone Authorized to Set Policy.

Many organizations will have a person or committee whose job it is to set policy for the survival and growth of the organization. It is important that the person or committee exists, and that they understand that policy making is a critical function.

At the highest levels of government, the chief executive for the country - whether a president, prime minister, or sheikh - is actually in the role of policy maker. If the person exists but is not actually present to do the work (see example from Africa described above) then, in fact, there is no one to set authorized policy and the government becomes corrupted.

At lower levels, such as a ministerial level, it is critical that the minister follow and implement policy from higher sources, but also that the executive staff of the ministry understand their own policy making role and that they are present to implement that role.

First, however, someone must have the responsibility of making policy.

Case Study 1.1

In Iraq, 2010, the country held an election and the results had been settled, but the Iraqis in government had not accepted the outcome. Consequently, they had not formed a new government. Government activity slowly came to a stop while the negotiations dragged on. Many important activities received little attention because it was unclear who would be the leader of the country and who would control the various government ministries. In other words, there was no one in the job of policy maker.

Without a person authorized to set policy, an organization will decay; it will become corrupt. Iraqis are aware of this risk and are struggling to work out an agreement that authorizes policy makers to take the job.

It may seem obvious that there must be a person in the job. However, depending on the organizational structure, the policy maker's *absence* may not be visible.

Case Study 1.2

In Central Asia, an international development company had structured its project such that its in-country project representative, the Chief of Party ("COP"), was little more than a reporting tool for the corporate directors in Washington D.C.

This arrangement might have been workable, except that the individuals in Washington D.C. were oblivious to the many policies that required setting at the local level. The COP had grown accustomed to taking action only when ordered. There was no one actually in the role of setting policy for field operations. Without clear policy, the staff became confused and lacked direction. As a result, staff productivity and production went into a slow decay.

In this case, the company kept policy-making authority in Washington D.C. out of a desire to impose clarity of executive intention. There was

no policy-making authority in the field and the Washington D.C. office did not recognize the need to set field operations policy. The project ended with lackluster results and bitter feelings. Project leadership didn't recognize what was missing and in frustration ended up blaming the U.S. Government representatives and the challenges of the country environment for poor performance on the project.

2. An Authorized Person Actually Setting Policy.

When a person has been put in the role of policy maker, that person must understand that s/he has the responsibility of actually setting policy. This is frequently a challenge for new or improperly trained executives who are drawn into numerous problems of the moment.

When executives find themselves drawn into one problem after another, they need to reestablish themselves as executives.

It helps to be aware of the principal duties of an executive. In simple terms, an executive accomplishes the purpose of the organization through the use of organizational skills and personnel.

At the highest levels of government, the executive's purposes include survival and prosperity for the people.

When individual ministries and commissions set unauthorized policies based on selfish, narrow or conflicting goals they corrupt the functioning of the larger organization. They cause it to decay. For example, when one government institution sets contracting policies that aren't coordinated with the spending and contracting authorities across the government, overall budgeting and spending for the government cannot be planned and coordinated. The government, by the action of one ministry, has become corrupted.

Case Study 2.1

In Al Anbar Province in Iraq during 2006, snipers, car bombs, or roadside bombs killed 13 of the 42-member council. The survivors understood the message from Al Qaeda and stopped coming to work. The Provincial Council had been elected to make policy for the area, but was unable to exercise that power. They were not actually setting policy. The Provincial government came to a stop and there was nothing but chaos in the province until they understood that stability in the area depended upon the existence of a group in the position of policy makers. Prior to this realization, these elected officials did not understand that they were in the essential role of policy makers. Once this was realized, they found a way to exert their policy-making role. The emergence of the Provincial Council as a policy making body can be directly linked to a diminished Al Qaeda threat in the area.

Case Study 2.2

A minister in a Sub-Saharan African Country refused to issue policy. He operated on the basis that everyone should "use their head" and do the work expected of public servants. He himself worked tirelessly on issues large and small. However, his second tier executives did not have the same ideas about their duties. Unlike the Minister, they were always quarreling over "territory" and benefits. The entire Ministry became preoccupied with the conflicts among the junior executives. No meaningful work issued forth from this Ministry, and only the Minister himself would work. It was corrupted.

If the executive is not setting policy, rest assured that employees WILL find something to do. However, it may not be consistent with the organization's goals and purposes and may well be counter to these goals.

3. Create Policies When Needed.

Policies provide clarity about organizational functions, powers, purposes, and roles so that people can act. Policies should define the important aspects of how employees carry out their jobs.

Case Study 3.1

An international development organization was tasked with quickly establishing operations in a post-conflict area. Time frames for hiring competent staff and immediate delivery of consulting assistance to local governments were tight. During the rush to get the project up and running, the organization used boilerplate job descriptions and policies for field management. They did not describe the actual requirements of the jobs or the actual operation of the organization. Essentially, the policies were a sham. The result was a large team of people without written policies addressing such fundamental issues as supervisory control and hiring authority.

The country director attempted to distance himself from those issues, preferring to leave them to administrative staff. Unfortunately, the administrative staff did not have authority to issue such policies and the matter lay completely dormant as the country director struggled to find out why his project wasn't meeting its targets. Similar to Case Study 1.1 above, the director could not see what wasn't there (the policies) and wasted a great deal of time demanding reports in an unsuccessful effort to discover the problem.

Failure to create policy when needed caused immediate decay of the project before it had begun. This project also came to a close with lackluster results.

A similar situation took place with the recent BP oil spill in the Gulf of Mexico. Prior to the spill, emergency plans had been developed that had

little to do with the situation in the Gulf of Mexico. Indeed, some addressed such matters as the impact on polar bears. The policies were a sham. Therefore, there were no policies and the results were catastrophic decay.

4. Set Policies to Solve Real Problems.

Policies must be informed enough and wise enough to forward the group purpose and to obtain agreement. Ignorant or bad policy, even when authorized, tends to persuade group members to set their own random policy.

A successful policy begins with a realistic analysis of what needs to be done to enhance the survival and prosperity of the group.

Executives must do all they can to ensure they have the most complete data possible when crafting policy decisions. Relying on a small number of data sources can result in an incomplete or incorrect view of a situation or problem to be solved.

The test of a policy is whether it makes sense. A policy that does not promote the survival of the larger group and help it reach its targets will be seen as dictatorial and pointless. Such a policy sends the signal to all concerned that policy is not used for the benefit of all. Thus, all policy becomes suspect.

Case Study 4.1

A government procurement department in one African country developed a good solution to the problem of getting fair priced food for soldiers. However, a government Minister insisted that this procurement solution include using his brother's transport company. The problem immediately became more complicated and the solution became confused by insertion of a selfish and authoritarian policy. The chicanery was obvious to the citizens and further underscored their belief that the government was corrupt.

Food was spoiled, money was squandered and people went hungry.

A natural consequence of suspect policy is disregard for that policy. The corruption of society through this mechanism can be extensive. It destroys group morale.

Once an arbitrary command has been introduced as a solution to a problem, this invites the introduction of further corruption into the organization.

Enactment of sensible policies that solve real problems can clear out these complications and simplify the problems of survival and prosperity.

5. Disseminate Correct Policies.

Policy makers must not only issue policy, but must set in place programs to assure that policies are known and easily available for review.

Case Study 5.1

An international development corporation had well established policies regarding the hiring of local staff. Included among those was a policy of encouraging its local staff to apply for positions that were appropriate for their skills and offered opportunities for professional advancement. However, due to the rapid staffing of one of its projects, its human resources staff and project management was unaware of these policies and had no idea where to find the applicable policies. The field staff and management developed an unauthorized policy of refusing to allow local staff to apply for other positions once they already had a job. "It would cause too much trouble for us."

The local employees immediately identified the injustice and began to treat the project leadership with suspicion and distrust. This also resulted in a loss of productivity as the staff

concluded that the project management sought to "hold them down."

Project management refused to recognize their role in the drop in morale and the team floundered.

The failure of this international development corporation to educate its project leadership on its existing policies for hiring and staff development created the corruption of the team operations at the very beginning of field efforts.

6. Insist on Applying Existing Policy.

Even the most dysfunctional organizations are likely to have existing policy on hand. This is especially true if the organization is a government. Often, however, policy is simply not applied and there is no insistence on its application. As discussed earlier, there are three common reasons for failure to apply policy. Knowing this, management can begin correction and insistence on application of policy.

Case Study 6.1

Police in a particular East African nation are governed by set policies regarding duties and expected behavior. Part of the duties of the traffic police are to set up road blocks for traffic checks to promote public safety. These "traffic checks," however, are often used to extract bribes. Additionally, non-traffic police who apparently just want a "piece of the action" also conduct "traffic checks."

The failure of the police management to handle its operations (1) has created distrust and unrest among the population (including a brief period where people would intentionally run into traffic police with their vehicles), (2) diverts officers from their actual duties of protecting the population, and (3) creates an endemic situation of corruption that sweeps in a massive part of the police force.

Refusal to implement known police policy assures that people will find ways to handle “justice” on their own, outside of the law, creating a corruption and decay of the government and society.

Case Study 6.2

An international corporation had extensive policies to prevent sexual harassment and a hostile environment in the workplace. Indeed, it was a model of politically correct workplace policies. However, one of its senior managers was a minority with good business connections in a key target market. This manager consistently made inappropriate physical contact with female employees. The female employees reported the matter to Human Resources but no action was taken. Many employees knew about the matter and it was reported on employee surveys. The company took no action. Employees concluded that the policies were not serious and that the workplace was not safe. They began leaving the company “without explanation.”

Refusal to apply its policies resulted in the loss of several talented individuals that had helped the company acquire over USD \$200 Million in contracts.

Case Study 6.3

Following the election violence in Kenya in 2007 - 2008, the country was under great pressure to prosecute the parties involved in the killings and destruction of property. To address the situation, Parliament attempted to create a special tribunal to try the post-election violence suspects. Of course, Kenya already had a justice system in place that was charged with handling violent crimes. But the Kenyan government and people simply had no confidence that the post-election violent crimes would be honestly prosecuted in their own courts. The decision by the Parliament to attempt to create a special tribunal was

essentially an admission that the existing justice system could not be relied upon to follow existing law in a political matter.

It is now more than 2 ½ years after 1,300 people died, many more were raped, beaten, and mutilated, and 600,000 people were driven from their homes. Criminal prosecutions are now being left up to the International Criminal Court. The Kenyan justice system seems to have been abandoned as irrelevant. The primary underpinnings of a society that keep it from devolving into regular violence are dissolving. Failure to apply existing policy threatens the complete corruption of the social order.

7. Correct False policy.

Policy makers must take action to assure that correct policy is being implemented across the organization. Failure to take this step assures that actions will be taken that are off policy or flatly illegal. This emphasizes the need for policy makers to provide enforcement mechanisms. Policy makers may need to be reminded that policy is intended to assure the survival of the organization by following a higher-level plan. Failure to follow actions/policies that support the plan is like a cancer that eats away until it causes the death of the organization.

Case Study 7.1

A group of government officials working in Iraq during 2007 were tasked with helping a provincial government develop project priorities to aid with reconstruction and development. In one situation, a U.S. Navy Engineer refused to share his project lists with the Provincial Council. He insisted on working only with the Provincial Governor for approval of the projects. The policy, by Constitution and order of the Ministry of Finance, was that the Provincial Council was given authority and responsibility to approve the community development priorities.

The Navy Engineer was unaware of the requirements in Iraq, but justified his behavior by explaining that the authority for prioritization rested only with the Governor. He was implementing a false policy. Later, when presented with the true requirements, he struggled to understand them because he believed that was not how it worked “back home.” Again, he was attempting to implement a false/wrong policy. Ultimately, the Engineer was educated on the true policy and the situation was corrected.

In this case, the operation of one of the provincial governments of Iraq was being corrupted through an implementation of false policy. There was no opportunity for the government to follow its development plan, and its operations fumbled until the false policy was detected and corrected. The decay of the system was halted and construction and development began to move forward according to plan.

8. Systems to Correct Policy Implementation.

Organizations survive and expand through effective operations. Policy exists to assure the survival of the organization. Thus, there must be systems to detect and handle actions that are out-policy. If there is no mechanism to detect problems indicated by the items on this New Tools for Fighting Corruption in Organizations, corruption will take root and expand as certainly as weeds come up in a garden.

There are many approaches to assuring that correct policies are being followed. The simplest is an internal audit system. However, the audit must go beyond merely tracking financial matters and include examination of the awareness and implementation of policy. Management representatives should travel throughout an organization on a regular basis querying all levels of staff about the

implementation of policy. When management fails to leave its office except for progress briefings or financial audits, they may not see the true reasons why their programs are struggling or failing.

When failure to follow policy goes unaddressed, it invites criminal wrongdoing. It is at this point that law enforcement becomes part of the system. Policy is plainly not being followed where there is criminal activity. Thus, some of the systems in place to detect, isolate, and report out-policy situations must include internal enforcement processes and a trigger that involves law enforcement.

Case Study 8.1

A tribal Sheikh in Iraq took responsibility for helping the people in his region secure jobs with U.S. Government contractors. In addition to the training the new employees received for their jobs, they also received a briefing from the Sheikh. It was unclear exactly what was being said, but the message was obvious to observers - “follow the rules, do what is asked of you, learn your job.”

Indeed, the Sheikh would regularly hold meetings across the region with people from his tribe who had received jobs with U.S. Government contractors. Periodically, he would correct them on their behavior and appearance. Where specific individuals began to be suspected of petty theft, he would immediately step in and address the situation.

The Sheikh had learned that the survival of his tribe - his organization - relied upon the reputation and gainful employment of its members. This was especially true at a time when Iraq’s economy was struggling. As “management” for his tribe, he took it upon himself to ensure that his members were following the policies of their employers. He was doing what he could to enforce policy and assure the survival of his group.

The points on the New Tools for Fighting Corruption in Organizations can be applied to any functioning group to determine the failure points of the organization and the program needed to repair the group.

The New Tools for Fighting Corruption in Organizations follows a hierarchy that flows from the policy making “top” of the organization through to the day-to-day implementation. The points can be reframed as questions to reveal the trouble spots in an organization that may allow or even encourage corruption. When trouble spots are identified, the New Tools for Fighting Corruption in Organizations leads to program development that can correct the situation.

The reader will also note that the Checklist represents an increasing scale of capability of an organization. The more points on the Checklist that an organization has addressed, the more capable the organization is.

As described in New Tools for Fighting Corruption in Organizations Point 8, this list should be used on a continuing basis to further ensure that the problems of day-to-day administration do not overwhelm the policy-making groups or persons.

Conceptually, this is a simple approach. Once trouble areas have been identified, the challenge becomes identifying an appropriate correction process. The goal is worthy of the challenge.

New Tools for Fighting Corruption in Organizations

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About Global Transitions & Development, LLC



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Change Management		

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